ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Advanced Television Systems	)	MM Docket No. 87-268
and Their Impact upon the	)	
Existing Television Broadcast Service	)	

To the Commission:

COMMENTS OF BLADE COMMUNICATIONS, INC.

Blade Communications, Inc. ["Blade"], by its attorneys, submits herewith its Comments in response to the Commission's Sixth Further Notice of Proposed Rule Making in the above-captioned matter.[1/]

Introduction

Blade is the parent of the licensees of four medium to small market television stations:[2/]

Independence Television Company
Television Station WDRB, Louisville, Kentucky
(Market No. 50)

Idaho Independent Television, Inc.
Television Station KTRV, Nampa, Idaho
(Market No. 127)

1/ Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service, Sixth Further Notice of Proposed Rule Making, MM Docket No. 87-268, FCC 96-317 (August 14, 1996) ["Sixth Notice"].

2/ Market sizes based on Nielsen DMA information set forth in Broadcasting & Cable Yearbook 1996 at C-153 et seq.

WLFI-TV, Inc.
Television Station WLFI-TV, Lafayette, Indiana
(Market No. 196)

Lima Communications Corporation
Television Station WLIO, Lima, Ohio
(Market No. 202)

As such, it has a material interest in optimally efficient and effective development and implementation of digital television service (DTV). Blade recognizes and applauds the tremendous time-consuming efforts of the Commission and its staff to that end.

Blade has been an active participant in regional Broadcast Caucus meetings and has closely followed the work of the Commission's Advisory Committee on Advanced Television Service (Advisory Committee), the Association of Maximum Service Television, Inc., the National Association of Broadcasters and others.

Blade is committed to a rational and effective transition to DTV operations and supports the Commission's ongoing progress toward that goal. Blade urges the agency to adopt industry-wide DTV standards, because use of such standards affords the only means of expeditious nationwide introduction of DTV service.

Blade's support of DTV is, however, tempered with a concern that an undisciplined rush to implement this technological advance will obscure the manifold practical difficulties associated with the transition from NTSC operations. There does not appear to be any overwhelming spontaneous public demand for abandonment of NTSC service in favor of DTV, nor has any compelling public interest been demonstrated which would support premature institution of incompletely considered DTV regulations.

Blade is also concerned that DTV allocations will perpetuate the competitive inequities associated with VHF/UHF technical disparities and that implementation of DTV services will have a disproportionate adverse impact on small market television stations.

Blade therefore urges the Commission to take the time, now, to consider fully the practical and competitive aspects of DTV implementation. Despite the long years of study, DTV still poses numerous unresolved issues. Forcing DTV operations before those issues are thoroughly addressed and resolved will disserve the public interest by imposing potentially unnecessary costs on broadcasters and, ultimately, on the public.

The Commission Should Conduct Further Practical Studies

Blade fully appreciates the complexities associated with the need to make optimal DTV assignments while maintaining NTSC service. It submits that this goal can best be achieved as follows:

(1) The Commission should adopt the Grand Alliance technical standards. Uniform technical standards are the only means of achieving rapid nationwide deployment of DTV.

(2) The Commission should modify Section 73.606 of its Rules to incorporate a table of DTV allotments that affixes the letter "D" to each current allotment that will be entitled to a DTV allotment.

(3) The Commission should open a separate further proceeding to investigate the technical parameters, channel and individual station operating parameters of each television station. This will facilitate DTV operations within each market that optimize station facilities in a competitivly equitable manner as well as assignment coordination with Canada and Mexico.

Blade submits that this further rulemaking will permit the Commission to achieve one of its current goals -- adoption of a DTV standard and a DTV table -- while still allowing flexibility for areas in which there is still substantial practical and technical uncertainty.

Allotment Decisions Should Consider Competitive Circumstances
In Each Television Market

Although Blade recognizes the difficulty of developing a DTV table of allotments that satisfies all affected parties, and acknowledges the work that underlies the DTV table set forth in the Sixth Notice, it believes that a fundamental goal of that table -- replication of existing NTSC service areas -- is misplaced. Rather than perpetuate -- and in some cases, exacerbate -- existing station service area disparities within individual markets, the Commission should seize the opportunity offered by the need for nationwide television reallotment to correct existing competitive inequities.

Blade urges the Commission to allocate DTV channels and facilities so that all stations within individual markets have comparable technical service capabilities. The proposal to adopt core DTV spectrum that includes both VHF and UHF channels would simply perpetuate the historical VHF/UHF disparity: a VHF allocation would continue to bring with it advantages in terms of operating costs, transmitter costs and public perceptions concerning the inadequacy of UHF service.

The Commission assumes that cable carriage will be available to compensate for possible loss of service associated with DTV (see, e.g., Sixth Notice at par. 33). But if mandatory carriage is no longer available,[3/] stations could be forced to make a major capital investment in DTV equipment only to find that viewers able to receive NTSC signals have been lost following

---

3/ The Commission's must-carry regulations are currently being reviewed by the Supreme Court, Turner Broadcasting System, Inc. v. FCC, No. 95-992 (filed December 21, 1995). There is thus no guarantee that cable carriage will be available to ameliorate VHF/UHF service disparities. Further, given the impact of the Commission's plans to reallocate spectrum on the availability of spectrum for translator operations, it appears that many UHF stations will no longer be able to rely on translators to compensate for inadequate off-air coverage.

DTV conversion. If off-air service area disparity exists, such stations will face potentially insurmountable barriers to maintaining high quality public service.

Existing VHF stations' technical advantage should not be grandfathered in a DTV environment: it is grossly unfair to permit one market station to enjoy a VHF DTV allotment and high power while requiring another market station to operate on a UHF DTV channel with significantly lower power. The Commission should instead fashion its DTV allotments so that all stations within a given market operate with comparable facilities.

At minimum, UHF stations must be guaranteed at least their NTSC Grade B coverage capabilities. Requiring already-handicapped UHF stations to scale down their coverage while maintaining coverage levels for other market competitors is governmental distortion of the competitive playing field that cannot be reconciled with the public interest. The need for new DTV allotments offers an opportunity to create technical parity within individual markets. The Commission should seize that opportunity and focus on comparable facilities for all market stations. Doing so would mean that a station's success would depend solely upon its service to the public. And in that environment, the public would be the ultimate beneficiary.

The Commission Must Address Practical Aspects Of DTV Implementation

The Commission's decisions in this proceeding[4/] are replete with discussions of the technical aspects of DTV operations and the allocations concerns surrounding the transition from NTSC operations. Notably absent from those documents are discussions of the practical aspects of DTV implementation. Yet these considerations -- real life concerns that broadcast stations

---

4/ The citations to these decisions are set forth in the Sixth Notice.

must deal with when introducing DTV service -- are critical to DTV service which optimally serves the public and the public interest.

For example, the Sixth Notice discusses possibilities for DTV tower location without adequately recognizing that local zoning regulations may present a significant problem for DTV implementation. Local zoning and planning authorities often oppose additional tower construction, even in existing antenna farms. Overcoming local opposition could cause delay which precludes compliance with Commission-imposed construction deadlines. Any DTV implementation schedule should, therefore, allow for delays caused by local regulatory authorities.

Another concern thus far inadequately addressed is power availability. Local utilities and rural electrical co-ops may require time in order to construct sufficient power grid supplies for the new class of digital transmitters used for DTV. Again, the implementation plan must consider this factor.

Even if this type of obstacle can be overcome, there is not at present any guarantee that equipment will be available or that tower companies will be able to build new DTV towers. (Nor is there any guarantee that DTV receivers will be available to or purchased by the viewing public. The lack of any demonstrated compelling public demand for DTV services suggests that there is no need for a rush to DTV implementation.) If nothing else, the uncertainties of equipment supplies indicates that market forces, not governmental orders, should determine the schedule of DTV implementation.

Although the Sixth Notice appears to assume that a channel change is a simple process of increasing height or power, in the real world a channel change takes time and money. The

financial burden of DTV transition on local stations has, for example, been inadequately considered. Particularly in smaller markets, station revenues and market share are stagnant or shrinking, even with downsizing and limits on capital expenditures. Stations are already bearing the costs involved in converting analog circuitry to far more expensive digital hardware. Adding the additional capital costs of wide ranging digital conversion (particularly if there are several channel changes associated with the transition to DTV, see, e.g., Sixth Notice at pars. 19 et seq.) could have a devastating impact on stations' financial -- and thus their public service -- capabilities.

Stations must not only bear the burden of purchasing new equipment and, possibly, arranging for a new site, but also of the promotional activities necessary to maintain viewers. Television stations spend hundreds of thousands of dollars to build public awareness of their services. These promotional costs would be increased if a station changes established channel location and would be multiplied with each required channel change. Yet the Sixth Notice erroneously assumes that channel changes can be accomplished easily and without significant disruption.

The practical difficulties of DTV implementation will be greatest for small market stations. The basic capital costs of a DTV transition could be substantially the same for most stations. But larger market VHF stations will be far more capable of absorbing those costs than small market stations which have an inherently smaller revenue base. The Commission must recognize this by providing for less stringent requirements and timetables for small market stations.

Blade submits that greater deference to market forces and less reliance upon governmental pressure will result in a smoother, better transition to DTV. Where governmental direction is needed, moreover, it should be the product of thorough consideration of individual circumstances, not a hasty broadbrush set of decisions keyed to large market stations at the expense of smaller market stations.

The Commission Must Also Resolve the Technical Issues Associated With the Transition to DTV

The Commission's decisions in this rulemaking merely scratch the surface of the manifold technical issues surrounding DTV. Even after almost a decade of study, there are more unresolved than resolved issues. The attached Engineering Statement highlights some of those issues that are of particular concern to Blade, including the proposed emission mask; the need for service area maps and comparative coverage information; interference to cable headends; and vertical polarization for DTV.

Blade respectfully submits that these and other issues must be resolved before the Commission requires stations to begin the move to DTV. Failing to do so could result in DTV service which does not fulfill its potential. The ultimate loser in that scenario will be the viewing public.

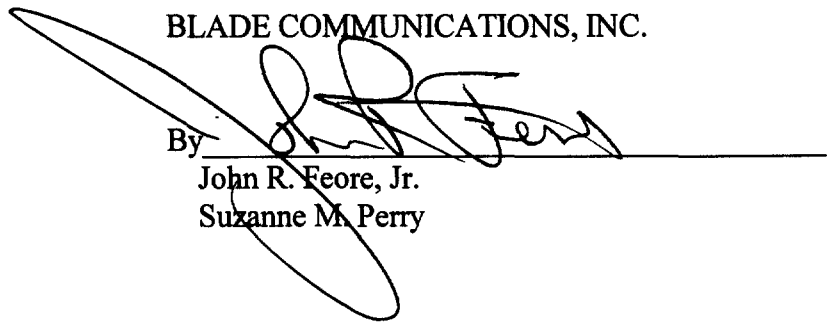
Conclusion

Blade Communications, Inc. believes that DTV will be the standard for future United States television service. But it also believes that the road to this goal should not be a hasty one of convenience. Rather, the public interest dictates prudence, including careful consideration of channel assignments, power levels, maximum implementation time tables, a standard acceptable

to the broadcast industry and, most significantly, an implementation schedule that is driven by market forces rather than government fiat.

Respectfully submitted,

BLADE COMMUNICATIONS, INC.



By _____
John R. Feore, Jr.
Suzanne M. Perry

Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Washington, D.C. 20036

(202) 776-2000

November 22, 1996

ENGINEERING STATEMENT OF COHEN, DIPPELL AND EVERIST, P.C.

ENGINEERING STATEMENT
ON BEHALF OF
BLADE COMMUNICATIONS INC.
RE: COMMENTS FOR THE
SIXTH FURTHER NOTICE OF PROPOSED RULE MAKING
IN MM DOCKET NO. 87-268
NOVEMBER 1996

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 21st day of November, 1996.

Notary Public

My Commission Expires: 2/28/58

This engineering statement has been prepared on behalf of Blade Communications, Inc. ("Blade") in support of its comments regarding In the Sixth Further Notice of Proposed Rule Making in MM Docket 87-268[1] ("Sixth Further Notice"). The Blade applauds the Federal Communications Commission ("FCC") in its endeavors of bringing of Digital Television ("DTV") terrestrial service to the consumer. It also commends the work of the Advisory Committee for all of its valuable contributions. It also appreciates the work of the Broadcast Caucus providing its insights in helping to establish a viable DTV system.

Blade is committed to bring DTV service into the areas in which it now serves with traditional NTSC service. It supports the adoption of a uniform nationwide DTV standard, as it recognizes that it is only through a uniform standard that technical transmission and corresponding receiver uniformity will ever occur. This is critically important to inaugurating and establishing a new service in an abbreviated time frame.

Blade has participated and will continue to participate in regional Broadcast Caucus Meetings. Blade has expressed its concerns at these regional broadcasting meetings and has sought clarification of proposed technical parameters and DTV planning factors. However, based upon information it has reviewed to date, its preference is the DTV frequencies assigned to its stations by the FCC assignment model and power. Blade, however, as discussed in these comments, strongly believes

[1]In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, Sixth Further Notice of Proposed Rule Making, MM Docket No. 87-268 (August 14, 1996).

that further work on these important topics is required and offers an alternate by adopting simultaneously a standard and DTV channel designation while providing for additional study of the channel, assignment and those stations that qualify for a DTV allotment.

A number of significant issues still must be resolved before the successful commissioning of the DTV service, including the following:

DTV Proceeding

Blade understands the complexity associated with making DTV assignments to individual stations while both maintaining the current NTSC service and achieving the maximum DTV facility as permitted by the market and allocation. In order to be able to proceed with these tasks in an effective and constructive time-frame, Blade urges the FCC to (1) adopt the Grand Alliance standard, (2) adopt a table of DTV allotments in Section 73.606 of the FCC Rules which affixes the letter D next to each current NTSC allotment entitled to a DTV allotment; and (3) open a separate further rulemaking concerning technical issues such as planning factors, channel allocations, and station operating parameters for each DTV allotment. This procedure would allow the FCC and the broadcast industry to continue toward achieving an effective and technically viable DTV system while protecting the current NTSC signal from DTV signal degradation.

This procedure would permit the immediate adoption of a DTV system and would establish those existing allotments that qualify for a DTV channel. It would

also provide the opportunity to establish the pertinent technical parameters to be used in determining station's individual parameters after the adoption of the DTV allocation table. It would also permit open technical issues to be resolved and would afford the FCC the opportunity to coordinate assignments with the neighboring administrations of Canada and Mexico[2]. This separate rule making would allow the FCC to permanently assign DTV channels and technical operating parameters once they become known while allowing flexibility for areas in which other technical details have not been fully established. Blade recommends that time tables and milestones be established so that the rule making can be concluded in the shortest feasible time-frame.

Blade believes this approach will be constructive by permitting the FCC to proceed with an immediate adoption of the DTV standard and the DTV table. The separate further notice can focus attention on the critical allocation and technical issues. A similar approach is commonly used in international forums in order to expedite final resolution of issues within a basic framework of the agreement to be adopted.

[2]For example, Canada DTV allotments will have substantial impact on Detroit and Buffalo, Cleveland allotments and other adjoining areas, while Mexican allotments will affect DTV allotments in San Diego and other border areas. In the United States, the assignment of these channels will impact other domestic DTV facilities elsewhere.

A good example is the Assignment Plan developed at the Second Session of the Region 2 Conference on AM broadcasting held in 1981. There were significant technical details in the Plan that had to be resolved after the Conference. The Plan comprised two lists, List A for those assignments when there were no unaccepted problems with the assignments and List B when unaccepted problems were to be resolved after the Conference. Specific procedures were prescribed for resolving the List B problems and for moving such assignments into List A from List B. Other conferences such as the HF Broadcasting Conference have had to develop procedures to deal with those assignments during the post Conference period that were not compatible with other assignment or frequency allocations for one reason or another. Such approaches could be used in the separate rule making.

Out-of-Band Emissions

The FCC and MST allotment proposals are based upon an assumption that the proposed emission mask will be sufficient to permit adjacent channel NTSC/DTV N + 1 and N-1 configurations[3]. Further, the assignment plan is also predicated upon both FCC and MST plans, or FCC alone the proposed emission mask and that it will permit first adjacent DTV to DTV operations from a common site. Blade has serious technical reservations that these proposed emission mask values can be easily realized

[3]Where N is the NTSC channel

or maintained. This is based upon its first-hand knowledge of problems encountered with its own NTSC operation of a new 240 kW UHF transmitter[4].

Propagation

The FCC proposal in the Sixth Further Notice has provided valuable information regarding service area replication. However, a service area map has not been provided. Blade believes that it is critical that the proposed service areas be plotted on a map and studied by individual station engineering personnel to ascertain whether the proposed service areas are realistic and comparable to NTSC. It is recognized that television receivers do not read the FCC Rules.

Blade owns and operates four television stations. WDRB, Louisville, Kentucky is in designated market number 50. Blade's three other stations (WLIO(TV), Lima, Ohio; WLFI-TV, Lafayette, Indiana; and KTRV(TV), Nampa, Idaho) are located in far smaller markets and serve areas where there are few other TV stations. Blade is aware that these three stations maintain significant viewers at, near, or past their predicted Grade B contours. Therefore, Blade believes that any DTV plan must provide information that demonstrates comparative coverage equality between NTSC and DTV coverage. Until the existing NTSC service areas of individual stations can be confirmed and that comparative DTV replication is actually achieved, Blade will continue to press its interest to the FCC in these critical matters.

[4]The 240 kW WDRB transmitter is composed of 5 tube klystrode (non-multiplexed) outputs

Creating Underserved Areas

As discussed above, the need to study individual stations' actual service areas is critical to the effective implementation of a DTV service. It appears that there may be some DTV assignments made which will create interference[5] to the existing NTSC service areas. If indeed that is the case this would create underserved areas where off-the-air NTSC service can at present be received. For many years, one of the hallmarks of FCC regulatory policies has been to promote service to areas in which few services are available. Blade believes that during transition from NTSC to DTV maintaining the current off-the-air NTSC terrestrial signal[6] without undue DTV interference is a critical prerequisite to successfully establishing a viable off-the-air terrestrial DTV service.

Blade further believes that inadequate attention has been directed to many outlying areas where cable head ends are often found. If interference results to cable head ends from DTV operations, this could be very disruptive to providing continued present NTSC service. Blade is concerned and will study further this very important aspect of continued service to the public, and it urges the Commission to do so as well. Blade encourages the Commission to study those areas in which newly created

[5]Other items need further scrutiny such as the propagation model variables of the Longley-Rice model. For instance has the proper K factor been utilized. Such variables in a sophisticated program cannot be automatically assumed to be uniform across the United States.

[6]Blade further believes that to maintain the current free off-the-air NTSC service area during the transition period benefits the economically disadvantaged groups and provides valuable service such as EAS to the general public in our society.

underserved areas by DTV interference to cable head ends[7] may occur and to adjust its DTV allotment plan accordingly.

WDRB, Louisville, KY

WDRB is licensed to Louisville, Kentucky and operates on Channel 41 with a non-directional power of 5000 kW (H) and 1,200 kW (v) directional. WDRB is a Fox affiliate and is in market number 50. WDRB-TV serves the Indiana Counties of Harrison, Perry, Crawford, DuBois, Orange, Martin, Lawrence, Floyd, Washington, Jackson, Brown, Monroe, Bartholomew, Jennings, Scott, Clark, Ripley, Jefferson, Ohio and Switzerland. It serves the Kentucky Counties of Meade, Breckinridge, Hardin, Bullitt, Larue, Nelson, Washington, Spencer, Anderson, Jefferson, Shelby, Franklin, Oldham, Henry, Owen, Carroll, Trimble and Gallatin. It is carried on 95 cable systems and with a total of 478,000 homes. The terrain encompassed by WDRB's predicted Grade B contour ranges from uniform or flat in Indiana to rugged in areas located south and west of Louisville.

The Sixth Report and Order is silent with respect to accommodation for vertical polarization for DTV. As indicated above, WDRB uses vertical polarization to enhance its service to the Louisville metropolitan area. Clarification is sought whether or not vertical polarization has been considered in the FCC replication of service and will it be permitted in future DTV transmissions to provide service augmentation.

[7]Similar protection of translator service is encouraged.

WLFI-TV, Lafayette, Indiana

WLFI-TV is the only station licensed to Lafayette, Indiana and operates on Channel 18 with a power of 1480 kW (maximum directional) and a HAAT of 238 meters (780 feet). WLFI-TV carries the CBS network and is in market number 196. The terrain encompassed by WLFI-TV is a deep river valley (150 meters typical) for the principal communities served and includes relative flat farm lands over lightly populated areas. WLFI-TV serves the Indiana Counties of Tippecanoe, Benton, White, Carroll, Clinton, Cass, Miami, Howard, Montgomery, Fountain, Warren, Vermillion, and portions of Newton, Jasper, Pulaski, Fulton, Wabash, Grant, Madison, Tipton, Boone, Putnam, and Illinois Counties portions of Iroquois and Vermilion. WLFI-TV is carried on 56 cable systems with a total subscribers of over 126,000 homes.

KTRV(TV), Nampa, Idaho

KTRV(TV) is licensed to Nampa, Idaho. KTRV(TV) operates with maximum facilities on VHF Channel 12 at an effective radiated power of 178 kW and a HAAT of 829 meters and is in market number 127. The terrain encompassed by the predicted Grade B ranges from uniform to mountainous. KTRV(TV) is affiliated with the Fox network. It has an application pending (FCC File Number BPCT-960711KF) to change site which it proposes to construct in order to accommodate a DTV allotment. KTRV(TV) serves the Counties of Ada, Blaine, Boise, Canyon, Gem, Gooding, Jerome, Elmore, Owyhee Payette, Twin Falls, Valley, Washington (all in Idaho), and Malheur, Oregon. KTRV(TV) programming is carried by 32 headends with

111,976 subscribers and 3 translators. It has an application (FCC File No. BPTTL-JD0415CW) on file for a new TV translator at Twin Falls, Idaho in order to provide additional service to the mountainous areas in which is located.

WLIO(TV), Lima, Ohio

WLIO(TV) is licensed to Lima, Ohio, the nation's 202nd television market. WLIO(TV) operates on Channel 35 with an effective radiated power of 661 kW and 165 meters HAAT. WLIO(TV) is affiliated with NBC and serves the following counties: Allen, Paulding, Putnam, Henry, Hancock, Defiance, Wood, Marion, Wyanot, Hardin, Auglaize, Seneca, Logan, Shelby, Mercer and Van Wert (all in Ohio) and Jay (Indiana). It is carried by 49 cable systems.

WLIO(TV) is typical of a small market station. The Grade B service area is more important to WLIO(TV) than to most large and medium market stations. Accordingly to February 1996 Nielsen survey, WLIO(TV) is viewed in the counties of Williams, Defiance, Henry, Paulding, Putnam, Hancock, Van Wert, Allen Hardin, Mercer, Auglaize, Logan and Shelby Counties (Ohio), and Jay County (Indiana). Viewers in these counties receive WLIO(TV) from both cable services and from off air reception. WLIO(TV) is also carried on 49 cable systems, with over 185,911 homes.

Practical Implementation Considerations

There are a number of hurdles that are not automatically addressed in a major undertaking such as implementing DTV. That process is far more complicated that

it appears at first blush and requires extensive implementation time due to the number of local and Federal approvals required. Some of these are as follows.

- If existing tower (owned)--structural studies need to be commissioned.
- If existing tower (lease) and negotiate a contract with tower owner and complete structural upgrades
- If new tower--property identified that meets FCC spacing criteria, zoning and FAA approvals[8] must be obtained, soil tests performed, state air boards, environmental statements/impact etc.
- If tower located in a common area with other broadcast facilities, there may be inadequate microwave frequencies to deliver the DTV signal to the transmitter site.[9]
- If existing transmitter site or new site:
  a. Zoning approvals for new or modified buildings will need to be obtained, environmental impact studies, state ADA compliance
  b. Public utility, power circuits may need to be constructed or be augmented
  c. New or augmented air conditioning, emergency power, etc. will be required
- Manufacturers of transmitter, transmission line, transmitting antennas have limited production capacities (see attached item from Andrew[10])

[8]Federal Aviation Administration ("FAA") airspace approvals for TV broadcast facilities are not rapidly processed by the FCC. It is requested that the FCC use its influence with FAA to expedite these requests.

[9]Blade believes that there is a shortage of useable microwave frequencies for both the Deer Point KTRV(TV) transmitter site (Boise) and the Floyd Knobs transmitter site WDRB-TV site (Louisville).

[10]The information compiled by Andrew Corporation, a leading supplier of transmission line and antenna products, indicates that based upon past history and resource constraints, the ATV station implementation rate may be constrained in the initial years after the FCC DTV adoption.

- There is only a limited number of experienced insured and qualified tower erectors or erection crews capable of erecting new or modifying existing tall or large towers

- Studio building space will need to be increased to accommodate the extra equipment capable of handling the DTV signal. That also will require additional land and zoning approvals. Building design time, mechanical equipment, lead time.

- Additional staff will need to be hired and trained

Summary

Blade appreciates the work of the FCC. Blade seeks to retain the integrity of the existing NTSC while implementing DTV. Blade believes that only through prudent technical planning can this be achieved. This by necessity begins with the current Sixth Further Notice and the subsequent actions taken by the FCC. Blade encourages the FCC to take these various technical factors into consideration and urges that it adopt a uniform nationwide standard, a DTV table of allotments with a letter "D" to the stations that qualify and open a further Notice to study channel number and power.

Resource Constraints

- Structural Analysis
- Antenna Production
- Transmitter Production
- Studio Equipment
- Tower Crews
- Microwave Transmission

ATV Station Conversions